

JONES DAY

250 VESEY STREET • NEW YORK, NEW YORK 10281.1047

TELEPHONE: +1.212.326.3939 • JONESDAY.COM

DIRECT NUMBER: +1.212.326.3808

JLOONAM@JONESDAY.COM

March 5, 2025

VIA ECF

The Honorable Michael E. Farbiarz
United States District Judge
U.S. District Court for the District of New Jersey
Frank R. Lautenberg U.S. Post Office & Courthouse
2 Federal Square
Newark, N.J. 07102

Re: United States v. Coburn and Schwartz, 19-cr-120 (MEF)

Dear Judge Farbiarz:

We write on behalf of defendant Gordon J. Coburn, joined by counsel for co-defendant Steven Schwartz, in response to the Court's Order at ECF No. 965. Defendants believe that the *ex parte* motion filed by the government and Debevoise & Plimpton LLP, *see* ECF No. 926 at 2, has stopped the "clock" established by the Speedy Trial Act of 1974 because, to Defendants' knowledge, that motion "concern[s] the defendant[s]," as it implicates the scope of the government's examination of any Debevoise witness. 18 U.S.C. § 3161 (h)(1)(D), (H).

In addition, until decided, we believe the "clock" is tolled while the Court considers the government's letter motion seeking a 180-day adjournment "to allow sufficient time for [the United States Attorney's] consideration of the application of the President's February 10, 2025 Executive Order to this matter." ECF No. 956.

Defendants also believe the "clock" is stopped until March 17, 2025 due to an issue that has been sealed by the Court. ECF No. 961

Respectfully submitted,

/s/ James P. Loonam

James P. Loonam

cc: All Counsel of Record (*via ECF*)